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Company, GEICO Casualty Company, and GEICO
Indemnity Company

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

GOVERNMENT EMPLOYEES
INSURANCE COMPANY, a Maryland
insurance company; GEICO GENERAL
INSURANCE COMPANY, a Maryland
insurance company; GEICO CASUALTY
COMPANY, a Maryland insurance
company; and GEICO INDEMNITY
COMPANY, a Maryland insurance
company,

Case No. 3:17-cv-00045-JR

JOINT STATUS REPORT

-and-

**JOINT AMENDED PROPOSED CASE
SCHEDULE**

Plaintiffs,

v.

LEIF'S AUTO COLLISION CENTERS,
LLC, an Oregon limited liability company
dba LEIF'S AUTO COLLISION
CENTERS, and LEIF HANSEN, an
individual,

Defendants.

Plaintiffs Government Employees Insurance Company, GEICO General Insurance Company, GEICO Casualty Company, and GEICO Indemnity Company, and Defendants Leif's Auto Collision Centers, LLC and Leif Hansen and state as follows:

1. On May 17, 2018, the Hon. Paul Papak issued the initial Order Staying this case while the parties pursued settlement negotiations. (ECF DOC. NO. 72). During the ensuing 21 months, the Parties have engaged in settlement discussions, including a private mediation with the Hon. Janice Wilson on July 25, 2018 and a Judicial Settlement Conferences with Judge Acosta on January 7, 2019 (ECF. DOC. NO. 89). The parties also met informally in Tucson in March 2019 in an attempt further settlement efforts outside the presence of their respective counsel and without a mediator.

2. On September 24, 2019, the parties were at an impasse and this Court entered a scheduling order that set deadlines related to the case. (ECF DOC. NO. 113).

3. Subsequently, the parties decided to again attempt to settle the matter and held a second Judicial Settlement Conference with Judge Acosta on February 18, 2020 (ECF DOC. NO. 117).

4. After the Judicial Settlement Conference with Judge Acosta, progress on settlement negotiations again reached an impasse. On April 3, 2020, the parties submitted a joint amended proposed case schedule that reflected the need for a discovery extension and to

acknowledge the impact of the complex and evolving COVID-19 pandemic on that schedule. (ECF DOC. NO. 118). The Court issued a new amended case schedule on April 7, 2020 (ECF DOC. NO. 119).

5. The Court's April 7, 2020 Order included a deadline (June 1, 2020) for the Parties to reconvene to evaluate whether any of the proposed dates, as entered by the Court in response to this submission, may require further adjustments. On May 21, 2020, the Parties conferred on the need for further adjustment in light of the complex and evolving COVID-19 pandemic. The Parties respectfully request that the Court grant the proposed amended schedule outlined below that includes a deadline (August 1, 2020) for the Parties to again evaluate whether any of the proposed dates, as entered by the Court in response to this submission, may require further adjustments based on Chief Judge Hernandez's Standing Order issued May 21, 2020, or other considerations that may arise.

6. Therefore, the Parties propose the following amended case management schedule.

Event	Current Deadline	Proposed Revised Deadlines
Deadline for Parties to reconvene to evaluate whether any of the proposed dates, as entered by the Court, may require further adjustment	6/1/20	10/1/20
Deadline for Joint Status Report regarding deadline amendments, if necessary.	6/1/20	10/1/20
Close of fact and written discovery (including opposing party and third-party depositions)	10/30/20	3/1/21
Written consents to Magistrate, if any	10/30/20	3/1/21
Initial expert report disclosure deadline	12/11/20	4/12/21
Rebuttal expert report deadline	2/19/21	6/21/21
Expert discovery completion deadline	3/26/21	7/26/21

Event	Current Deadline	Proposed Revised Deadlines
Dispositive motion deadline	4/9/21	8/9/21
Pretrial Order deadline	5/10/21 or until 30 days after this Court's final ruling on dispositive motions, which ever is later	9/10/21 or until 30 days after this Court's final ruling on dispositive motions, which ever is later

DATED this 29th day of May, 2020.

Respectfully Submitted,

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